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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN MARTIN LUNA MORELOS,
aka "Juan Martin Luna,"

Defendant.

Case No. 2:23-mj-918-NJK

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Justin Washburne, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and _____, Assistant Federal Public Defender, counsel for defendant JUAN MARTIN LUNA MORELOS, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the

PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 24th day of October, 2023.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Raquel Lazo
Assistant Federal Public Defender
Counsel for Defendant JUAN
MARTIN LUNA MORELOS

/s/ Justin Washburne
JUSTIN J. WASHBURNE
Assistant United States Attorneys

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

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6 JUAN MARTIN LUNA MORELOS,
aka "Juan Martin Luna,"

7 Defendant.

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**Order Directing Probation to
Prepare a Criminal History Report**
~~[Proposed]~~

8
9 Based on the stipulation of counsel, good cause appearing, and the best interest of
10 justice being served:

11 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
12 report detailing the defendant's criminal history.

13 DATED this 25th day of October, 2023.

14
15 
16 HONORABLE NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE